

are provided for in the appendix to this petition.

2. The Fifth Amendment, United States Constitution, pertinent provisions are provided for as set forth in the appendix to this petition.
3. The Sixth Amendment, United States Constitution, pertinent portions are provided for as set forth in the appendix to this petition.
4. The Seventh Amendment, United States Constitution, pertinent portions are provided for as set forth in the appendix to this petition.
5. The Eighth Amendment, United States Constitution, pertinent portions are provided for as set forth to the appendix to this petition.
6. The Fourteenth Amendment, United States Constitution, pertinent portions are provided for as set forth in this appendix to the petition.
7. The Oregon Constitution pertinent provisions are Art. 1, § 10, Art. 1 § 11, Art. 1 § 17, Art. 1 § 20, Art. 1 § 21, Art. 1 § 33, as set forth in the appendix to the petition.
8. The Oregon Statutes pertinent provisions are ORS 9.527, ORS 10.030, ORS 12.070, ORS 12.130, ORS 12.140, ORS 70.280, ORS 183.310 to 183.550, ORS 183.310(2)(a), ORS 670.325(1), as set forth in the appendix to the petition.
9. The Oregon Bar Rules of Procedure pertinent provisions are BR 2.2, BR 2.3b, BR 2.3d, BR 2.4, BR 2.5, BR 3.5, BR 3.5a, BR 3.5(1), BR 3.5(b), BR 4.5, as set forth in the appendix to the petition.

STATEMENT OF THE CASE

Justus "Buck" Humphreys, was a member of the Oregon State Bar since 1980, the Texas State Bar since 1987, and the Iowa State Bar since 1962. In 1991, he was convicted of federal tax offenses allegedly occurring in the 1980's for total taxes due of \$14,000, by a jury with a dishonorably discharged felon. The federal clerk sent copies of the convictions to the state bars. The Texas Bar found the conviction to be a void judgment because of the illegal juror and recommended no discipline. *No jury trial or trial panel was held.* On appeal, The Texas Supreme Court in 1994 found compulsory reciprocal discipline was mandatory on conviction and disbarred for a five year period.¹ The Iowa and Oregon Bars suspended Humphreys within six (6) months of conviction. In 1994 following the Texas Court ruling Iowa recommended a reciprocal five year suspension with credit for the temporary suspension. *No trial panel hearing was held.* Humphreys residing in Texas since 1987 accepted the suspension and did not oppose it at the Iowa Supreme Court. The court disbarred Humphreys but disbarment was not permanent. Humphreys was reinstated in Oregon after five (5) years. (1992-1997). The Oregon State Bar filed a notice of discipline in another jurisdiction January 12, 2005. The State Professional Responsibility Board (SPRB) held a *private* conference with OSB Disciplinary counsel in November, 2004 and in considering the *confidential* report of disciplinary counsel not given to Petitioner recommended disbarment pursuant to B.R. 3.5. *No Oregon local professional responsibility committee, nor trial panel was appointed.* No evidentiary hearing was held.

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Similar to the Oregon former BR 6.1(e) disbarment rule in effect until (12/14/96).

The Oregon Bar Association Rules of Procedure provide the following in the case of a resident lawyer's discipline:

- (1) appointment of an investigator (Rule 2.2);
- (2) appointment of a Local Professional Responsibility Committee ("LPRC") to take evidence, issue subpoenas, to compel documents and witnesses and make a decision reporting to the next level State Professional Responsibility Board ("SPRB") (Rule 2.3d);
- (3) The SPRB has the same authority as the LPRC for evidentiary hearing. (Rule 2.3b);
- (4) The supreme court disciplinary committee then appoints a trial panel (Rule 2.4) "to try the issues" and render an opinion with "specific findings of fact, conclusions and disposition". Briefs on issues may be filed and a record of the evidence is kept;
- (5) A formal complaint is filed, reviewed by the SPRB for "probable cause". (Rule 2.5);
- (6) Discovery including requests for production and admission and depositions are allowed (Rule 4.5). The burden of proof to establish misconduct is on the bar by clear and convincing evidence.

In this case, and in others involving lawyers admitted to multi-jurisdictional disciplined in another state Rule 3.5 reciprocal discipline applies cutting off and barring all of the above rules and procedures and proceeding directly to formal complaint "based on the discipline in the jurisdiction whose action is reported". (Rule 3.5a). The supreme court may order a hearing at which time the "accused" attorney shall have the

burden of proof (Rule 3.5(f) not the bar as in a resident lawyer case. In this case, however there was no hearing before the supreme court nor any panel or investigating officer, no discovery, and no opportunity to present evidence or be heard. (Query, whether the burden of proof and standard by clear and convincing evidence on the bar changed to the "accused".)

In Oregon the judgment of discipline by Texas in 1994 under Rule 3.5b is conclusive evidence of misconduct. There was no complaint of any misconduct in Oregon, nor has there been any complaint by a client upon which Petitioner has been disciplined in forty two (42) years. There was no complaint of any current misconduct. The misconduct was alleged tax evasion of \$14,000 going back to 1983, twenty two (22) years ago. The conviction in 1991 with a jury that had a convicted felon dishonorably discharged juror that was discovered by Petitioner's defense counsel on the third day of an anticipated six (6) week trial.² The defense counsel ended the trial in two (2) weeks not calling nineteen (19) defense witnesses nor an expert that sat through trial because he expected a new trial. Petitioner has always maintained his actual innocence.

In this case, the "Accused" is actually innocent of any wrongdoing and that there was no question that was raised regarding his "honesty, trustworthiness or fitness as a lawyer". That the only conduct on the part of the "Accused" was to sign tax returns prepared by C.P.A.'s with complete records compiled by office staff which allegedly omitted income for taxes of \$14,000 in total spread over a five (5) year period (i.e. \$2800/year average.) The charges did not meet the Department of Justice Guidelines for prosecution. (See OSB Formal

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Petitioner is a former U.S. Army JAG officer, Vietnam Vet. Someone a juror convicted of a felony, dishonorable discharged from the military might be prejudiced towards.

Opinion 1991-95; Legal Ethics Opinion 362; ABA Ethics Opinion 1279.) **That the judge in sentencing for the "convictions" found that there was no conduct on the part of the Accused as a lawyer, and that it did not involve a scheme of wilful violations.** No action was "knowingly" or "intentionally" done by the "Accused". That further, the facts that were not presented in evidence due to ineffective assistance of counsel, as well as, an exonerating polygraph show no such tax was owed.

The Answer of Petitioner to the Formal Complaint in Oregon filed directly without discovery investigation, and evidentiary hearing, raised the following objections and federal constitutional questions and requested a hearing. They were overruled by the courts mandatory summary judgment:

Petitioner's Answer states: "That the accused files the following objections and requests hearing thereon!"

RECIPROCAL OREGON RULE 3.5 IS UNCONSTITUTIONAL AS A MATTER OF LAW AND FACT: That this proceeding has been filed as a special proceeding under B.R. 3.5. That B.R. 3.5 is contrary to and flies in the face of the statutes, law and constitutions of Oregon and the United States. That as such, it is objected to and should be dismissed or transferred to the standard contested cases formal complaint process provided by B.R. 4 which provides for the administration of resident lawyers in the State of Oregon, with discovery, evidentiary hearing and burden of proof upon the Oregon State Bar (OSB) by clear and convincing evidence. That B.R. 3.5 is applicable only to the "Accused" and to other lawyers similarly situated that as non residents or members of another bar association have suffered discipline in another jurisdiction. (That violates the statutory and constitutional rights of the "Accused" and others in the class of lawyers traveling between jurisdictions, under

privileges and immunities, equal protection, and due process requirements of the 14th Amendment.)

That in this case and others similarly situated, the earlier discipline in another jurisdiction was based upon the same mandatory compulsory discipline process without discovery, evidentiary hearing and a burden of proof placed improperly on the Accused with a different standard of evidence and procedure from resident lawyers accused of the same or similar conduct.

BR. 3.5 VIOLATES OREGON STATUTES: That ORS 670.325 (1) provides that:

670.325 Proceedings on denial of license; retraining violations; authority of hearing officers' record of proceedings. (1) All proceedings for the refusal to issue, or the suspension or revocation of any license, certificate of registration or other evidence of authority required to practice any profession subject to the authority of a professional licensing or advisory board shall be conducted pursuant to the procedure for contested cases required or authorized by ORS 183.310 to 183.550.

That ORS 183.310Aa defines "contested case" as a proceeding:

(2)(a) "Contested case" mean a proceeding before an agency:

(A) In which the individual legal rights, duties or privileges of specific parties are required by statute or Constitution to be determined only

after an agency hearing at which such specific parties are entitled to appear and be heard;
(Emphasis added.)

(ORS 670.325(1) requires "all proceedings" conducted as "contested cases, ORS 183.310, 2a requires a hearing where parties were entitled to appear and be heard. Non of this was done in this case. There were no hearings and Petitioner was not allowed to appear at any agency considerations.)

That ORS 9.527 also requires: "proper proceedings for that purpose."

That "contested case" and "proper proceedings" authorized and required are not the "special proceeding" provided for in B.R. 3.5 which does not provide for discovery, evidentiary hearing, and switches and modifies the burden of proof on the OSB by clear and convincing evidence. This applies only to that class of lawyers that travel in a multiple jurisdiction practice, (This case is in complete opposition to the privileges and immunities, equal protection and due process allowed to resident lawyers that are not admitted elsewhere.) It is disparate and opposite of the equal protection provided in "contested case" proceedings to all resident lawyers accused of the same or similar conduct. (See In Re Medrano, 956 F2d 101 (5th Cir 1992 - requiring a clear and convincing evidence, burden of proof on the bar.)

ORS 70.280 Denial, suspension or revocation of license is prohibited solely because of a criminal conviction; exception. Except as provided in ORS 342.143 or 342.175, no licensing board or agency shall deny, suspend or revoke an occupational or Drofessional license or certification solely for the reason that the applicant or licensee has been convicted of

a crime, but it may consider the relationship of the facts which support the conviction and all intervening circumstances to the specific occupational or professional standards in determining the fitness of the person to receive or hold such license or certificate. [1973 c.359 §1; 1991 c.662 §6a]

(These statutes were not followed by the Oregon Bar Procedure.)

That this special proceeding under B.R. 3.5 violates the due process clause of the 14th Amendment to the U.S. Constitution as it applies in Oregon, and the "due course of law" that every man shall have pursuant to Art. 1, §, 10 of the Oregon Constitution. That Resident lawyers are favored over non resident and multi jurisdictional attorneys do not have the same rights. That it further violates each and all of the following. Art. 1, Sections 11, (Rights of Accused), 17, (Right to jury trial), 20 (Equality of Privileges and Immunities), 21 (No Ex Post Facto Laws), 33 (Other rights and privileges), Oregon Constitution; U.S. Constitution, Article IV, Section 2 (Privilege and Immunities), Amendments V (Due Process, Double Jeopardy), VI (Rights of Accused), VII Trial by Jury, VIII No Excessive Punishment, XIV Privileges and Immunities, due process, equal protection, (See also, Piper v. New Hampshire, 470 US 274 (1985)) - holding that the distinction between residents and non residents by a bar association is unconstitutional.)

BR. 3.5 EXCEPTION - "NO DAY IN COURT:

Humphreys has not had his "day in Court." That there has been no "opportunity to be heard." (B.R. 3.5©)(1)). That the "convictions" and disciplinary proceedings upon which the claims and causes in the Notice of Discipline in Another Jurisdiction (hereinafter referred to as "Notice") are based, were not accomplished with due process and equal protection

of the law allowed under the 5th, 6th, and 14th Amendments of the U.S. Constitution and "due course of law", under Articles I, Sections 1, 10, 11, 17, 20, 21, and 33 of the Oregon Constitution. There being no adequate evidentiary hearing and opportunity to offer evidence on the alleged conduct involved in the 1980's. (Going back to conduct twenty two (22) years ago. Restatement of Conflict of Laws 2nd §104 - "A judgment rendered without judicial jurisdiction or adequate opportunity to be heard will not be recognized or enforced in another state.")

"CONVICTION" - VOID VERDICT:

That the laws of the State of Texas which was the "Accused's" residence at all times material to the 1991 trial (14 years ago) for alleged conduct in the eighties (22 years ago) upon which the underlying "misconduct" and first discipline is based confirm that a verdict of guilty with a dishonorably discharged convicted felon on the jury is a void verdict not entitled to any validity nor "conclusive evidence of guilt." (Texas Criminal Proc. Ann. Art 35.19 (1989), Tweedle v. State, 158 Tex. Crim 200 218 SW2d 846 (1949) See also ORS 10.030 excluding felons as jurors. Restatement of Conflict of Laws 2nd §104 - "A judgment rendered without judicial jurisdiction or adequate opportunity to be heard will not be recognized or enforced in another state." (See also, In Re Matter of Lloyd Humphreys, 880 SW2s 402 (1994)). (BR 1.4 provides the choice of law of Texas should be followed, it was not.)

DELAY & LACK OF "DUE COURSE OF LAW" PREJUDICIAL:

That the claims and causes in the Notice are untimely, delayed and subject to the defense of laches, as well as, barred by the Oregon statute of limitations. That the alleged conduct involved is from the 1980's up to twenty two (22) years ago and the claims of failing to disclose from 1991 "conviction" (14 years ago). They further violate Art. 1, Section 10 of the Oregon

Constitution in that they do not "...completely and without delay..." allow remedy by due course of law for injury done "to" a person, property, or reputation", both in delay and lack of "due course of law." That the "Accused's" property and liberty interests are involved herein and lack of speedy hearing and denial of any trial is presumptively prejudicial to the "Accused", as a matter of law.

BARRED BY STATUTE OF LIMITATIONS:

That Oregon provides several statutes of limitations that show that this action should be barred. This entire proceeding is based upon alleged conduct in the 1980's that were the basis of a United States District Court Judgement in 1991. ORS 12.070 provides: "an action on a judgment or decree of the United States...shall be commenced within ten (10) years".

It is now over thirteen (13) years since that judgment. It should be barred. ORS 12.130 could be considered in this case as well. It provides: "Action for penalty...shall be commenced within one (1) year after the commission of an offense. If the action is not commenced...within two (2) years thereafter on behalf of the state..".

The offenses from the 1980's go back as far as twenty two (22) years ago. If these do not apply then ORS 12.140 would: "An action for any cause not otherwise provided for shall be commenced within ten (10) years."

It has been more than thirteen (13) years since the conviction for conduct twenty two (22) years ago.

EX POST FACTO LAWS SHOULD NOT APPLY:

That in consideration of the Notice and any possible discipline that may be imposed no discipline, or rules of conduct that were established after any of the conduct found to have occurred should be considered or imposed against the "Accused". The

same being ex post facto laws in violation of Article 1, §21 and 10 Oregon Constitution. (E.G. Oregon "Disbarment" under law at the time was, a five (5) year suspension not permanent.) "The basis for lawyer discipline is the ethics rules in force in the state **at the time of the conduct...**" (ABA/BNA Lawyers Manual on Professional Conduct 101:2002. i.e. 1980's.-that was not done in this case.)

That the Texas State Bar Panel on Professional Responsibility, titled Board on Disciplinary Action (BODA) had dismissed the proceeding recommending no discipline exonerating Humphreys. That had BODA suspended the accused for a short time, rather than completely exonerating him from any misconduct by dismissal no disbarment would have occurred (Texas Rule 8.5). But see, Restatement of Conflict of Laws 2nd §104 - "A judgment rendered without judicial jurisdiction or adequate opportunity to be heard will not be recognized or enforced in another state."

Former discipline in another state does not preclude determination that an attorney is fit to practice in Oregon. Many other states have so held. (See E.G. In Re Van Bever, 101 P2d 790 (Ariz 1940), Kentucky Bar v. Signer, 533 SW2d 534 (194. 1976), In Re Weiner, 530 SW 2d 222 (Mo 1975), 547, SW 2d 959) Oregon case law also establishes this Court's individual review and determination whether any sanction is necessary based on the individual case facts shown by the evidence.

"The central inquiry concerns *the present ability* and disposition of the applicant to practice law completely and honestly.: (Restatement 3rd Law of Governing Lawyers, (ALI 2000) § 2 p. 19).

(No allegation as to present ability and fitness has been made.)

That Humphreys has never been disciplined based upon any complaint filed by a client in forty two (42) years. That no judge, attorney, or client who was involved with the underlying charges ever determined from alleged conduct that the "Accused's" conduct should ever be reported or disclosed as misconduct under DR1-103 in any jurisdiction. No such reporting disclosures were made by any judge or attorney that had an obligation to do so, if there was a substantial question as to lawyer Humphreys honesty, trustworthiness or fitness as a lawyer.

Each and every other case that the OSB cites can be distinguished. That each of these cases cited by disciplinary counsel had a trial panel that took evidence concerning the "Accused's" conduct that was involved. The misconduct was either admitted, or not contested, the hearing trial panel found violations of the D.R.'s and there was little or no mitigating circumstances. There were no due process problems. This is not the case here.

Due process and equal protection under the XIV Amendment to the U.S. Constitution, and Art. 1, Section 10 "Due Course" and Sections 21, 33 equal protection under the Oregon Constitution are extant in this case in which:

(1) a felon, dishonorably discharged juror returned a judgment of conviction against Humphreys a former Judge Advocate officer which under the law of Texas, Iowa and Oregon results in a void judgment;

(2) the bar professional responsibility committees of Texas and Iowa did not recommend disbarment, Texas recommended no discipline and dismissal of the proceeding, Iowa recommended a five (5) year suspension with credit for three and one half (3 ½) years;

(3) Iowa and Texas both did not have trial panels for a full opportunity to present evidence, cross examine witnesses, and normal due process.

(4) BR. 3.5 does not meet the Oregon Statutory requirements for equal entitlement with resident lawyers of a "contested case" procedure - no trial panel is provided, the standard and burden of proof is changed, there is no confrontation of witnesses, presentation of evidence or presumption of innocence for a due process - due course of law hearing;

(5) the statutes of limitation in Oregon bar this case proceeding;

(6) Humphreys ineffective assistance of counsel denied him his day in court. These palpable defects violate due process and are exceptions to reciprocal discipline. (In Re Ruffalo, 390 U.S. 544 (1968), (7 Am Jur 2d Attorneys §39, objections above.)

That the Oregon Supreme Court decisions do not set out any findings, nor conclusions of law. The Orders of disbarment and denial of reconsideration were entered without hearing nor presentation of any evidence. The Oregon Supreme Court overruled all objections and the request for hearing.

That this was the third "reciprocal discipline" proceeding (Texas, Iowa and Oregon) contrary to the customary rights and procedures given to resident lawyers. There was no jury trial which is a Texas resident lawyer's right, no trial panel which is an Iowa and Oregon resident lawyers right. There was no discovery, and no burden of proof on the bar. In Oregon no appearances were allowed before the bar committees, and no hearing before the Oregon Supreme Court. That in all cases, the state bar rules at the time of the "reciprocal discipline special proceedings" were followed - not those existing at the time of the alleged misconduct.

REASONS FOR GRANTING WRIT

1. THAT THE OPINION AND PROCEDURE OF THE OREGON SUPREME COURT IN THIS CASE ARE CONTRARY TO THE LAW AS SET OUT BY THIS HONORABLE COURT, THE LAW OF OREGON AND OTHER STATE COURTS.

The Oregon decision conflicts with this court's decisions. In Saenz v. Roe, 526 US 489 (1999). This Honorable Court protected the rights of new residents that traveled to California to receive welfare payments on a basis equal to that of other residents. Not to do so denied them the same privileges and immunities and equal protection enjoyed by other citizens of the same state, violating the 14th Amendment. That same legal precedent applies here. Oregon denied these rights to Petitioner contrary to Saenz. This equality of privilege is what has been taken away here. Justice Bradley in the Slaughter-House cases is quoted:

A citizen of the United States has a perfect constitutional right to go and reside in any State he chooses, and to claim citizenship therein, and an equality of rights with every other citizen; and the whole power of the nation is pledged to sustain him in that right. He is not bound to cringe to any superior, or to pray for any act of grace, as a means of enjoying all the rights and privileges enjoyed by other citizens. (Id at 1526.)

Justice Stevens for the majority continues referring to citizens who have completed their interstate travel stating: "At / 505. But since the right to travel embraces the citizen's right to be treated equally in her new State of residence, the discriminatory classification is itself a penalty".

Chief Justice Rehnquist with Justice Thomas joining, in dissenting agrees that new residents in a state have, "the same rights as other citizens of the state". (Id at 1530).

Justice Thomas with Chief Justice Rehnquist joining in dissent quote: Justice Washington from Corfield v. Corfield, 6 F. Case 546 (No. 3, 230) (CCED PA 1825,):

We feel no hesitation in confining these expressions to those privileges and immunities which are, in their nature, fundamental; which belong, of right, to the citizens of all free governments; and which have, at all times, been enjoyed by the citizens of the several states which compose this Union...What these fundamental principles are, it would perhaps be more tedious than difficult to enumerate. They may, however, be all comprehended under the following general heads:

Protection by the government; the enjoyment of life and liberty, with the right to acquire and possess property of every kind, and to pursue and obtain happiness and safety; subject nevertheless to such restraints as the government may justly prescribe for the general good of the whole. The right of a citizen of one state to pass through, or to reside in any other state, for purposes of trade, agriculture, professional pursuits... (Id. at 1537.)

Because I believe that the demise of the Privileges or Immunities Clause has contributed in no small part to the current disarray of our Fourteenth Amendment jurisprudence, I would be open to reevaluating its meaning in an

appropriate case. Before invoking the Clause, however, we should endeavor to understand what the Framers of the Fourteenth Amendment thought that it meant. We should also consider whether the Clause should displace rather than augment, portions of our equal protection and substantive due process jurisprudence. The majority's failure to consider these important questions raises the specter that the Privileges or Immunities Clause will become yet another convenient tool for inventing new rights, limited solely by the "predilections of those who happen at the time to be Members of this Court. (Id. At 1538.) (Emphasis added)

This could be that "appropriate" case that Justice Thomas and this court could reevaluate and "augment, portions of our protection and substantive due process".

Nothing is more basic to the livelihood of our nation as the profession of the practice of law, and the rule of law. We have both here. Petitioner is being denied the practice of law by abandonment of the rule of law by "special proceedings". Should the due process rule of law with it's equal protection and privileges and immunities apply to our profession? Never has Petitioner been disciplined on a complaint by a client in 42 years of practice. No current conduct has been complained of except that back to the eighties based on a judgment in 1991. In Oregon ORS 12.070 states: "an action on a judgment or decree of the United States...shall be commenced within ten (10) years".

It is now over thirteen (13) years since that judgment. It should be barred. ORS 12.130 could be considered in this case as well. It provides: "Action for penalty...shall be commenced within one (1) year after the commission of an

offense. If the action is not commenced...within two (2) years thereafter on behalf of the state..."

The offenses from the 1980's go back as far as twenty two (22) years ago. Oregon has violated it's own statutes and constitution. It obliterates the rule of law here.

The practice of law is a privilege protected by the privileges and immunities clause. (*Supreme Court of New Hampshire v. Piper*, 470 U.S. 274 (1985), *Morrison v No. Carolina Board Bar Examiners*, (E.D. N.C.) No 5.04-C.V.-92-BO (3/9/05) 21 ABA/BNA Lawyers Manual on Professional Conduct

The case of *Theard v. U.S.*, 77 S.Ct.1274 (1957) by the Honorable Justice Frankfurter, for the U.S. Supreme Court should be recalled in considering disbarment,. at page 1276:

Disbarment being the very serious business that it is, ample opportunity must be afforded to show cause why an "Accused" practitioner should not be disbarred...grave reason existed which should continue us that to allow the natural consequences of the judgment to have their effect would conflict with the duty which rests upon us not to disbar except upon conviction, that under principles of right and justice, we were constrained to do ... We do not think that the "principles of right and justice" require a federal Court to enforce disbarment of a man eighteen years after he had uttered a forgery."

In our case, the claimed misconduct goes back to 1983 - twenty two (22) years ago with no claims of current misconduct. Considering the circumstances, do the "principles of right and justice" require severe discipline in this case at this

time?!

It has been generally recognized that:

"The consequences of disbarment are so severe, both in degrading an attorney in the eyes of the community and in depriving the attorney a means of livelihood, that it should be ordered only when the misconduct of the attorney may properly be characterized as gross." ...Further, an attorney should be disbarred or suspended only where his or her continuance in the practice will be subversive of the proper administration of justice, or incompatible with a proper respect of the Court for itself or a proper regard for the integrity of the profession..."(7 Am Jur 2d Attorneys §36, citing McLaughlin v. Graves, 73 OR 331).

Humphreys, an honors graduate in Law and Theology, has a current record of service to the profession having just completed a term as Secretary of the OSB CLE Committee, relinquishing the Chair for 2005 due to this Notice, as a volunteer for the OSB Military Assistance Panel, the Appellate Panel for Capital Cases, (currently representing Larry Cole, Murderer); family law volunteer, volunteer attorney for voter protection in the presidential election, lawyer mentioning modest means cases, parental terminations, veterans benefits, and others. He has been a member of the Oregon Trial Lawyers (CLE Committee Volunteer), Oregon Defense Lawyers, and Lane County Bar. He has been Chair of the Oregon Fish and Wildlife Access and Habitat Council Willamette Watershed for two years. He is a priest, ordained in 1997 with an active general practice ministry offering reduced fees for those of modest means with heavy contributions of pro bono services and payments to clients of statutory approved fees of thousands

of dollars. This provides a necessary public service between legal aid and standard fees. There has never been an incident of disrespect to the Courts, the profession or clients; in forty two (42) years). This coterie of compulsory reciprocal decisions first in Texas, then in Iowa and now in Oregon are based upon one another with continuing severity and reliance on the foregoing summary - compulsory - reciprocal discipline all of which lack the normal procedural provisions and rights guaranteed to other lawyers. They did not provide full and fair due process and due course of law hearings. There were all "special proceedings and denied the "Accused lawyer" (Petitioner) rights granted to other lawyers.

2. THIS CASE WOULD ALLOW REVIEW AND SUPERVISORY DIRECTION OF THE LARGE NUMBER OF STATES CHANGING THEIR RULES AS TO MULTI-JURISDICTIONAL LAWYERS AND THE VARIETY OF STATE CASES DEPARTING FROM THE USUAL COURSE OF JUDICIAL PROCEEDINGS.

The Oregon Bar Rules of Procedure applied in this case, violate the constitution both in the establishment and the enforcement, abridging the rights to due process, equal protection and privileges and immunities. Similar "reciprocal discipline" rules exist in many states obliterating the rights and privileges of multi-jurisdictional lawyers from resident lawyers.

This case is unique in that three (3) separate jurisdictions all applied the summary mandatory reciprocal penalty based on the conclusiveness not of another full state bar disciplinary proceeding with full due process but rather on required penalties without regard to the individual or the particular facts, from other "reciprocal special proceedings". This case would allow consideration by this court of the multiple bar considerations and how the rule of law applies to the Petitioner and all other multi-jurisdictional lawyers. Basic

disparate treatment by intentional arbitrary discrimination between established residents and new residents or lawyers traveling between states should not be tolerated.

Although, it has been held that states can establish standards for admission and regulation of professionals. (Goldfarb v. Virginia State Bar, 421 US 773 (1995)). This case does not involve competence nor fitness to practice law at this time. No such allegations have been made. It involves different standards, procedures, burdens of proof and waiver of all due process by mandatory summary "special" proceedings different and apart from residents contrary to the usual course of judicial proceedings. It could be called a "star chamber" rule of law; but it does not even rise to that level. It completely ignores due process and the rule of law and Oregon's own statutes and constitution. The express terms of the bar rules and the improper enforcement are intentional arbitrary discrimination!

There is a conflict that exists in the United States concerning the State Supreme Courts decisions as to multi-state lawyer reciprocal discipline. Some automatically, apply a mandatory conclusive summary proceeding as has been done by the multiple jurisdictions in this case. Others do not. (See e.g. Discipline-Attorney's Foreign Conviction, 98 ALR 3d 357, Disbarment or Suspension in other State, 81 ALR 3d 1281; 7 AmJur2d Attorneys at Law Sect. 39; 88). But no other state cases have been found that do not apply the statute of limitations as was done in this case. The Oregon Supreme Court finds no basis in law or fact for it's failure to apply the statutes of limitations. Under all limitation statues the action against Petitioner is barred. In fact, the Oregon Supreme Court makes no findings or legal conclusions to support it's orders.

3. STATE COURTS AND BAR ASSOCIATIONS IN THE UNITED STATES ARE IN CONFLICT CONCERNING

LAWYERS DISCIPLINE IN NORMAL CONTESTED CASES, AS WELL AS, SPECIAL RECIPROCAL PROCEEDINGS AND SHOULD SETTLE THE IMPORTANT FEDERAL QUESTIONS THAT HAVE NOT BEEN RESOLVED.

The states are in disarray over how these "reciprocal discipline" provisions should be applied. They are denoted as "special proceedings" and the multi-jurisdictional lawyers that have traveled from state to state are treated differently from the normal contested disciplinary procedures applied to other resident lawyers.

There is also an uncertain issue because of the different sanctions used from state to state. This is especially true for the death penalty sanction of "disbarment". That is construed differently in different jurisdictions. In some it is a permanent provision, without rights of readmission. Others disbar for a limited time, generally five (5) years; others have not set out the length of time the lawyers profession is denied to him and his/her services denied to the public. There is also the issue of unauthorized practice. What can a disbarred lawyer do for work? Can he provide pro bono services? Can he work as a legal assistant under the supervision of a licensed lawyer for legal aid? This varies from state to state. There is no national arbitrator in these matters except this Honorable Court if a proper case is presented. This is that case!

ABA Model Rule 8.5 on reciprocal discipline and Rule 5.5 on multi-jurisdictional practice was adopted by fourteen (14) states in November, 2004. In twelve (12) other states it is was pending adoption.

A citizen of the United States has a perfect constitutional right to go to and reside in any State he chooses, and to claim citizenship

therein, and an equality of rights with every other citizen; and the whole power of the nation is pledged to sustain him in the right. He is not bound to cringe to any superior, or to pray for any act of grace, as a means of enjoying all the rights and privileges enjoyed by other citizens. (Supra, *Saenz v. Roe*, 521 U.S. 439 (1999))

Do these rules receive ex post facto application to pending matters or do the rules in existence at the time of the alleged conduct warranting discipline apply? Must the statutes of each state be followed for lawyers as they apply to other citizens? Must specific findings and conclusions of law be made before disciplinary orders? (Yes, *In Re Clark*, AZ, No5B-03-0113-D, 4/1/04, 20 Lawyers Manual on Professional Conduct 201.) Is a lawyer entitled to appear at any proceeding and argue and present evidence? Is there any limitation that bars prosecution of an accused lawyer?...

Lawyers should have the basic civil liberties of other citizens. Rules should apply to them equally whether residents or multi-jurisdictional lawyers.

These reciprocal special proceedings are bastard - illegitimate progeny of bar associations restricting the right to work when they become court cases. Are they criminal proceedings in which the "accused" lawyer is entitled to the same rights as accused's in other cases? Are they civil matters with penalties so that *Halper* and *Austin* case - requirements apply? (*Austin v. U.S.* 113 S.Ct 2801 (1991), *Halper v. U.S.* 490 US 435 (1989). Are they civil matters at law, or equity in accord with those laws? They are designated as "sui generis" proceedings by many jurisdictions (OR.BR.1.3). That uncertain classification denies all lawyers - in this case both single resident and multi-resident traveling lawyers there civil rights

and liberties. The rights that all accused lawyers are given in disciplinary case proceedings are uncertain and vary from state to state because of this "sui generis" label so that there is no standard due process across America. It removes all lawyer disciplinary matters from a national rule of law. This Honorable Court is called upon for direction and supervision.

At the time of the alleged misconduct of the Petitioner in the 1980's, in Oregon, "disbarment" meant a five (5) year suspension with right to readmission thereafter. Now, it is considered a permanent prohibition. (BR. 6.1d) This is not based on the time of the alleged misconduct, but instead the date of the filing a Formal Complaint, "An attorney disbarred as a result of a disciplinary proceeding commenced by Formal Complaint after December 31, 1995, shall never be eligible to apply for admission". This is an ex post facto penalty and a bill of attainder prescribing a capital professional penalty of disbarment after the conduct has already occurred with a different penalty. It is prohibited by Art. 1, § 9, CL3, Art 1, §10 CL 1, U.S. Constitution.) In Texas, in 1994, at the time of Petitioner's first mandatory "reciprocal" disbarment it was a five (5) year suspension with right to readmission. But another bar exam was required. In Iowa, the second "reciprocal" disbarment there is no rule on the length of time for readmission. But it is not prohibited. Does the rule at the time of alleged misconduct apply, the time of the first discipline case decision, or the time the other state jurisdictions file the "reciprocal special proceeding"? It should be the law in effect at the time of the alleged misconduct.

Should the sanction of discipline penalty be equivalent from one jurisdiction to the next? If so, what is equivalent in a state in which disbarment means a five (5) year suspension (Texas) and one that is permanent (Oregon)? Here Oregon's new rules apply a permanent disbarment when the reciprocal was a 5-year suspension. The penalty disbarment was increased

after the fact in 1996. An Ex Post Facto rule!

There are then privilege and immunity questions as to every level of the lawyer disciplinary process in every state from investigation, hearing complaint, trial sanctions and reinstatement, but this is especially true for these "special proceedings" in which lawyers traveling from one state to another are subjected to "reciprocal" mandatory discipline without due process and equal protection of the law.

The American Bar Association (ABA) states, 'in practice disciplinary procedures are diverse and jurisdictions do things differently. Lawyer discipline cases are neither civil nor criminal, but a unique type of case whose procedures may be drawn from either civil, criminal or administrative law...)A lawyer's due process right to fair notice of the charges against him was established by the U.S. Supreme Court in *In re Ruffalo*, 390 U.S. 544 (1968). Certain generalizations can be made, and some steps are followed in the majority of jurisdictions. . . . Once a complaint is docketed, discovery is generally available to both the respondent and the disciplinary prosecutor. A trial is held before a judge or an assigned hearing officer; both parties may examine and cross-examine witnesses and introduce documentary evidence. The bar prosecutor has the burden to prove the charges by clear and convincing evidence. Intermediate independent review of the hearing record is afforded prior to consideration by the state's highest court. (ABA/BNA Model Rules of Professional Conduct 101:2101.) (Emphasis added.)

The ABA Model Rules MRLDE Rule 11, comment notes that "fairness requires that no recommendation adverse to the respondent be made without providing him or her an opportunity to be heard. (Id 101:2104.) The lawyer's protection against self incrimination was upheld in *Spevak v. Klein*, 385 US 511 (1967). The right to due process in *In Re Ruffalo*, 390 US 544 (1968). These proceedings may be sui generis but should the definition of due process and due course of law be different for those accused of crimes and accused lawyers?! In *Specht v. Patterson*, 386 US 605, 608-609 87 S.Ct. 1209, 18L Ed2d 326 (1967) states:

"Due process...requires...(3) have an opportunity to be heard (4) be confronted with witnesses against him (5) have the right to cross examine, and (6) to offer evidence in his own behalf, and (7) there must be findings adequate to make appeal meaningful" *Specht*, 386 US @ +610 (See also *DeAngelo v. Schiedler*, 307 OR 91, 94 (1998), Oregon Constitution Art 1, § 12.

The multiple "reciprocal compulsory disciplines" also raise the issue of the double jeopardy clause of the 5th Amendment, U.S. Constitution which prohibits successive prosecutions and multiple punishments for the same offense. (*State v. Cloutier*, 286 OR 579, 585 (1979)

"Civil pleadings may advance punitive, as well as, remedial goals. The notice of punishment cuts across the division between civil and criminal law." (*Austin v. U.S.* 113 S.Ct. 2801 (1993)). A right to a jury trial in normal contested disciplinary matter for resident lawyer is provided in some jurisdiction (See E.G. Texas, Georgia). However, in Texas this Petitioner was denied a jury trial under the special mandatory reciprocal discipline procedure. Just as he was in Oregon denied a trial panel hearing before any agency or court.

In reviewing the customary procedure in lawyer discipline cases the ABA (Supra, ABA/BNA Model Rules 101:2111) states:

After the respondent answers and puts material facts in issue some kind of hearing is afforded in every jurisdiction. In almost half the jurisdictions the local rules of civil procedure govern discovery. (Emphasis added.)

In this case, there was no evidentiary hearing and no discovery. That appears to be the case for all "reciprocal proceedings" contrary to the regular rules of court. The ABA continues: "A majority of jurisdictions considering the question have held, and the MRLDE provide, that disciplinary charges must be proved by clear and convincing evidence".

That is by the burden of proof on the bar. In Oregon for only multi-jurisdictional lawyers that B/P is reversed and placed upon the "Accused". (Oregon does not label the lawyer "respondent" but rather "Accused".) That is the only change in the burden and standards of proof as to lawyers discipline in Oregon - clear denial of equal protection and privilege and immunities of lawyers traveling to Oregon.

Laches and the statute of limitations applies in some jurisdictions but not others. It has been held that the "passage of time affects the fundamental fairness of the proceeding giving rise to a due process violation (*In Re Briggs*, 502 NE 2d 879) (Ind. 1987) *In Re Eisenberg*, 423 NW 2d 867 (Wis. 1988) (Id 101:12113). In our case all the applicable Oregon statutes of limitations barred any legal proceeding against the Petitioner. That entitlement was ignored treating Petitioner disparately from all others.

The present status of many jurisdictions changing their

rules and procedure concerning multi jurisdictional lawyers means it is timely that this court should exercise it's supervisory powers in this developing area of law and jurisprudence so that the rights of our lawyers in the battle fronts of changing rules of law receive equal protection and privileges and immunities wherever they may travel.

CONCLUSION

What good is an ethical rule without a moral application? The core of ethical morality is choosing to do the right thing by acting responsibly and applying the rule and the spirit of the law under constitutional principles. Fair rules require fair and equal enforcement.

The first moral principal is the Golden Rule. It is a basic principle of exchange reciprocity - "do unto others, as you would have them do unto you." In essence, the Golden Rule tells us to ask ourselves, how would I feel if this were done unto me? If you could look at the facts in this matter with that question in mind the unfairness and denial of constitutional rights in the stacked multiple reciprocal reciprocity and its difference from standard disciplinary procedures highlights the abuses inherent within its application in this case.

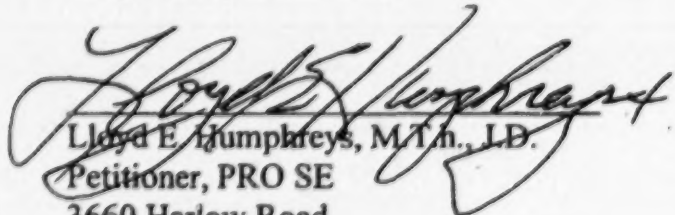
In Matthew 7:1-5 Jesus tells us to be cautious not to cross the line between legitimate enforcement of rules of law and failure to do so. In the Jewish Misnah custom and law ask that we "do not judge your fellow until you are in his position." When you judge man weigh the scales in his favor." (Aboth 1:6, 2:5). I look at that as an ancient rule of law to presume innocence until all the facts are known and full and fair hearing is held. Not the conclusive presumptions and changes of burdens of proof inherent in the limited exceptional case of inequality and prohibited rights in the mandatory reciprocal discipline "special" procedure. When the underlying facts are not known, but punishment is simply multiplied by several

summary conclusive rushes to judgment, in the shadow of doubt of a void judgment without knowing clear details of the underlying facts of conduct, the categorical imperative of the unconditional command of reciprocal discipline punishment without any exceptions creates a blind side to facts and circumstances and multiple punishments without fairness and justice. This is especially true when stacking a series of presumptive summary conclusive orders with never "a day in court," as we know it, a "special procedure contrary to other lawyers subject to disciplinary procedures.

In philosophy and theology, there is a well known fallacy of logic call "*post hoc ergo propter hoc*" literally, "after this, therefore because of this." That is, the reciprocal disciplinary fallacy under the facts of this case. The false choice of reciprocal mandatory conclusiveness that earlier conduct is all bad does not depict the subtleties and nuances of the underlying facts which can be brought out only through full and fair hearing with the traditional rights given to others. That should be the prevailing usual course of judicial disciplinary proceedings across these United States. It is now and it is prayed that this Honorable Court will establish the rule of law.

It is prayed for the foregoing reasons that this petition for Writ of Certiorari be granted.

Respectfully submitted,



Lloyd E. Humphreys, M.T.N., I.D.

Petitioner, PRO SE

3660 Harlow Road

Eugene, Oregon 97401

541-484-2825 Telephone

541-484-2826 Facsimile

05 - 53 8 AUG 22 2005

OFFICE OF THE CLERK

In The

Supreme Court of the United States
OCTOBER TERM, 2005

LLOYD EDWIN HUMPHREYS,
Petitioner,

V.

OREGON STATE BAR,
Respondent.

APPENDIX VOLUME I
TO
PETITION FOR WRIT OF CERTIORARI TO THE
OREGON SUPREME COURT

REV. LLOYD E. HUMPHREYS,
M.Th., J.D.
3660 Harlow Road
Eugene, Oregon 97401
541-484-2825 Telephone
541-484-2826 Facsimile
Petitioner, PRO SE

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APPENDIX A

**UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

**IN THE SUPREME COURT OF THE
STATE OF OREGON**

In Re:) Oregon State Bar Case
) Number: 04-128
Complaint as to the conduct of)
) SC S52070
JUSTUS BUCK HUMPHREYS,)
) ORDER IMPOSING
Accused.) RECIPROCAL
) DISCIPLINE

Upon consideration by the court.

The Oregon State Bar's recommendation that the accused be disbarred from the practice of law is allowed. Justus Buck Humphreys (OSB No. 80470) is disbarred from the practice of law in Oregon, effective the date of this order. The Bar's motion to strike the supplemental affidavit is denied.

Dated this 8th day of March 2005.

s/
WALLACE P. CARSON, JR.
CHIEF JUSTICE

c: Justus Buck Humphreys
Stacy J. Hankin

APPENDIX B

**IN THE SUPREME COURT OF THE
STATE OF OREGON**

In Re:)	Oregon State Bar Case
)	Number: 04-128
Complaint as to the conduct of)	
)	SC S52070
JUSTUS BUCK HUMPHREYS,)	
)	ORDER DENYING
Accused.)	PETITION FOR
)	RECONSIDERATION

Upon consideration by the court.

The court has considered the petition for reconsideration and orders that it be denied.

Dated this 24th day of May 2005.

s/
WALLACE P. CARSON, JR.
CHIEF JUSTICE

c: Justus Buck Humphreys
Stacy J. Hankin

APPENDIX B 1

**IN THE SUPREME COURT OF THE
STATE OF OREGON**

In Re:) OSB Case No. 04-128
)
Complaint as to the conduct of)
)
JUSTUS BUCK HUMPHREYS,) BR 3.5 NOTICE OF
) DISCIPLINE IN ANOTHER
Accused.) JURISDICTION AND
<hr/>) RECOMMENDATION

Notice of Discipline in Another Jurisdiction

Pursuant to Bar Rule (BR) 3.5(a), the Oregon State Bar hereby notifies the Oregon Supreme Court that Justus Buck Humphreys, (hereinafter "the Accused") OSB No. 80470, has been disciplined for misconduct in the states of Texas and Iowa.

In August 1991, the Accused, then known as Lloyd E. Humphreys, was convicted of four counts of felony tax evasion and one count of misdemeanor willful filing of a false tax return. (Copies of Judgments are attached as Exs. 1 and 2) On December 7, 1992, those judgments were affirmed by the

Eighth Circuit Court of Appeals. *United States v. Humphreys*, 982 F2d 254 (8th Cir. 1992) *rehg denied*, January 21, 1993, *cert denied*, 410 US 814 (1993). (Ex. 3)

On March 30, 1994 the Supreme Court of Texas disbarred the Accused for violating Texas Rule of Discipline 8.05. *In the Matter of Lloyd E. Humphreys*, 880 SW2d 402 (Texas 1994) (Ex. 4) In relevant part, that rule provides that when a lawyer has been convicted of an intentional crime, and that conviction becomes final, the lawyer shall be disbarred unless the Board of Disciplinary Appeals suspends the Lawyer's license. (DR 1-102(A)(2) and ORS 9.527(2) are the equivalent Oregon disciplinary rules.)

On November 23, 1994, based upon the above-referenced criminal convictions and other matters, the Supreme Court of Iowa revoked the Accused's license to practice law. *Committee on Professional Ethics v. Humphreys*, 524 NW2d 396 (Iowa 1994). (Ex. 5) In that proceeding the Accused was found to have violated the following Iowa Rules of

Professional Conduct: DR 1-102(A)(3) prohibiting a lawyer from engaging in illegal conduct involving moral turpitude; DR 1-102(A)(4) prohibiting a lawyer from engaging in conduct involving dishonesty, fraud, deceit or misrepresentation; DR 5-101(A) prohibiting a lawyer from engaging in a self-interest conflict of interest; DR 5-103(B) prohibiting a lawyer from providing financial assistance to a client; DR 5-104(A) prohibiting a lawyer from entering into improper business transactions with a client; and DR 9-102(C) prohibiting a lawyer from improperly commingling funds. (DR 1-102(A)(2), DR 1-102(A)(3), DR 5-101(A), DR 5-103(B), DR 5-104(A) and DR 9-101(A) are the equivalent Oregon disciplinary rules).

Recommendation of the SPRB

At a meeting on November 20, 2004, the Oregon State Bar's State Professional Responsibility Board (SPRB) directed Disciplinary Counsel:

1. To notify the Oregon Supreme Court of the Accused's discipline in the states of Texas and

Iowa; and

2. To advise the court that, under BR 3.5(a), the SPRB recommends that the Accused be disbarred from the practice of law in Oregon.

Discussion

Disbarment is the appropriate sanction where a lawyer engages in serious criminal conduct a necessary element of which includes false swearing, misrepresentation, or fraud. *ABA Standards for Imposing Lawyers Sanctions* (hereinafter "*Standards*") § 5.11(a); *In re Garvey*, 325 Or 34, 932 P2d 549 (1997) (lawyer who committed felony escape, supplying contraband, perjury, and false swearing was disbarred); *In re Leonhardt*, 324 Or 498, 930 P2d 844 (1997) (lawyer who committed forgery, tampering with public records, and official misconduct was disbarred).

Felonious tax evasion or filing of fraudulent tax returns is serious criminal conduct for which disbarment is the appropriate sanction. *In re Hendricks*, 306 Or 574, 761 P2d

519 (1988) (lawyer who was convicted of tax fraud and aiding in the filing of false tax returns was disbarred); *In re Pennington*, 220 Or 343 P2d 774 (1960) (lawyer who, among other things, filed false and fraudulent federal tax returns, was disbarred).

Aggravating circumstances properly attributable to the Accused are: (1) dishonest or selfish motive; *Standards* § 9.22(a); (2) a pattern of misconduct; *Standards* § 9.22(c); (3) multiple offenses, *Standards* § 9.22(d); and (4) substantial experience in the practice of law as the Accused has been a lawyer in Oregon since 1980, *Standards* § 9.22(i).

Mitigating circumstances properly attributable to the Accused are: (1) lack of a prior disciplinary record in Oregon, *Standards* § 9.32(a); and (2) imposition of other penalties as the Accused served jail time and had been disciplined in two other jurisdictions, *Standards* § 9.32(k).

In light of the above, the SPRB believes that disbarment is the appropriate sanction to be imposed upon the Accused

under BR 3.5.

Procedure under BR 3.5

Pursuant to BR 3.5(c), the Accused has the opportunity, within 21 days from the filing of this notice, to file an answer with the court discussing the following issues:

1. Was the procedure in the above-described Texas and Iowa disciplinary proceedings lacking in notice or opportunity to be heard?
2. Should the Accused be disciplined by the Oregon Supreme Court?

Pursuant to BR 3.5(c), the Accused is required to mail a copy of his answer to Disciplinary Counsel and file proof of mailing with the court. Pursuant to BR 3.5(d), the Bar then has 14 days to file a reply to the Accused's answer, assuming an answer is filed. Review by the court thereafter proceeds under BR 3.5 (e).

A copy of BR 3.5 is provided to the Accused with this Notice.

7 B1

DATED this 12th day of January, 2005.

OREGON STATE BAR

By: s/

Stacy J. Hankin, OSB No. 86202
Assistant Disciplinary Counsel

APPENDIX C

Oregon	5200 S.W. Meadows Road, P.O. Box 1689,
State	Lake Oswego, Oregon 97035-0889
Bar	(503) 620-0222 or inside Oregon 1-800-452-8260,
1935	Regulatory Services Fax (503) 968-4457

November 22, 2004

Justus Buck Humphreys, Esq.
Humphreys & Associates
3660 Harlow Rd.
Eugene, OR 97401

Re: Case No. 04-128— Justus "Buck" Humphreys
(Reciprocal Discipline)

Dear Mr. Humphreys:

At its November 20, 2004 meeting, the State Professional Responsibility Board discussed the discipline imposed in Iowa and Texas. I wanted to let you know that the SPRB decided to recommend that the Oregon Supreme Court disbar you as a matter of reciprocal discipline (BR 3.5).

In the next week I will be preparing a notice and other materials for filing with the Oregon court, with copies to you.

Thank you for your cooperation and assistance. Please feel free to contact me with any other comments or questions.

Very truly yours,

s/

Linn D. Davis

Assistant Disciplinary Counsel

Ext/ 332

LDD/rjl

Enclosures (Bar Rules of Procedure)

49-03